

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRANDON SMIETANA and)
SKYCOIN GLOBAL FOUNDATION LIMITED,)
a Singapore company, and SYMBOLIC)
ANALYTICS INC. a Delaware Corporation)

Plaintiffs,)

v.)

BRADFORD STEPHENS,)
AARON KUNSTMAN,)
HARRISON GEVIRTZ, f/k/a “HaRRo”,)
RYAN EAGLE, ADAM YOUNG,)
FAR AHEAD MARKETING, LLC.,)
JOEL WAYNE CUTHRIELL f/k/a “JOEL”,)
MORGEN PECK, TRISTAN GREENE,)
BRYAN CLARK, CATHERINE BYERLY,)
STEVEN LEONARD, JOSHUA OGLE,)
CONDÉ NAST d/b/a THE NEW YORKER,)
THE NEW YORKER, and)
UNKNOWN INDIVIDUALS AND COMPANIES)

Defendants.)

Case No. 1:22-cv-00708

Honorable Sara L. Ellis

JURY DEMANDED

**PLAINTIFFS’ MOTION FOR LEAVE OF COURT
TO FILE A SECOND AMENDED COMPLAINT**

NOW COME Plaintiffs, BRANDON SMIETANA (“Smietana”), SKYCOIN GLOBAL FOUNDATION LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation (“SA”), by and through their attorneys, The Law Office of Michael C. Goode, for their Complaint against Defendants, Bradford Stephens, Aaron Kunstman, Harrison Gevirtz f/k/a “HaRRo”, Ryan Eagle, Adam Young, Far Ahead Marketing, LLC., Joel Wayne Cuthriell f/k/a “JOEL”, f/k/a “Caribou”, Morgen Peck, Tristan Greene, Bryan Clark, Catherine

Byerly, Steven Leonard, Joshua Ogle, Condé Nast d/b/a The New Yorker, The New Yorker, and *UNKNOWN INDIVIDUALS AND COMPANIES*, states as follows:

1. This Honorable Court issued an Order on July 14, 2022 allowing Plaintiffs leave until August 31, 2022 to file their Amended Complaint at Law.
2. While editing Plaintiffs' Complaint at Law, counsel for Plaintiffs discovered that the Statute of Limitations for defamation against a yet to be named third party, Conde Nast d/b/a The New Yorker runs today, August 18, 2022.
3. Therefore, although Plaintiffs filed an Amended Complaint at Law on August 18, 2022 to preserve the Statute of Limitations date against Conde Nast d/b/a The New Yorker, Plaintiffs will continue require the additional time as ordered by this Court on July 14, 2022, to fully incorporate all additions and changes necessary against the remaining parties.
4. Consequently, Plaintiffs request leave of Court to file their Second Amended Complaint at Law by the date originally ordered by this Court of August 31, 2022.

WHEREFORE, Plaintiffs pray that this Honorable Court enter an order allowing Plaintiffs to file a Second Amended Complaint at Law by August 31, 2022.

DATED: August 18, 2022

Respectfully submitted,

/s/ Michael C. Goode
Michael C. Goode

Michael C. Goode, Esq.
Michael C. Goode & Company
111 W. Washington Street, Suite 1750
Chicago, Illinois 60602

Phone: (312) 541- 1331
Lawoffice_mcgoode@yahoo.com